

**UNITED STATES DISTRICT COURT  
FOR THE  
DISTRICT OF VERMONT**

ESTATE OF WAYNE BRUNETTE by  
BARBARA BRUNETTE, as Personal  
Representative and Administratrix of the  
ESTATE OF WAYNE BRUNETTE, and  
BARBARA BRUNETTE, Individually,

Plaintiffs,

v.

CITY OF BURLINGTON, VERMONT; CITY  
OF BURLINGTON POLICE DEPARTMENT,  
CHIEF MICHAEL SCHIRLING, in his  
Individual and Official Capacities; CPL.  
ETHAN THIBAULT; in his Individual and  
Official Capacities; CPL. BRENT NAVARI, in  
his Individual and Official Capacities.

Defendants.

Case No. 2:15-cv-61

**SCHEDULE OF EXHIBITS TO DEFENDANTS' MOTION TO DISMISS AND  
STATEMENT OF UNDISPUTED MATERIAL FACTS**

The following Exhibits are submitted in support of Defendant's Motion to Dismiss and  
Statement of Undisputed Material Facts:

Exhibit A: Affidavit of Deputy Chief Jannine Wright

Attachment 1: Vermont State Police Casebook

- (a) Call to BPD
- (b) Radio calls
- (c) Cpl. Brent Navari Sworn Statement
- (d) Cpl. Ethan Thibault Sworn Statement
- (e) Raymond Little Sworn Statement
- (f) Mary Little Sworn Statement
- (g) J1 Sworn Statement
- (h) J2 Sworn Statement
- (i) Kelly Medlar Statement
- (j) Marcus Medlar Sworn Statement
- (k) Ruthine "Dolly" Statement
- (l) Lawrence Brunette Statement

- (m) Initial On-Scene Interviews (Mary Little)
- (n) Crime Scene Photographs

Attachment 2: Howard Mental Health Comprehensive Mental Health Training Materials

Attachment 3: Cpl. Brent Navari Training Record

Attachment 4: Cpl. Ethan Thibault Training Record

Attachment 5: BPD Directive DD 05: Response to Resistance/Use of Force

Attachment 6: BPD Directive DD 13.02: Interacting with Persons with Disabilities

Exhibit B: Affidavit of Vermont State Police Det. Sgt. Darren Annis

Exhibit C: Affidavit of Kelly Medlar

Exhibit D: Affidavit of Ruthine "Dolly" Brunette

Exhibit E: Affidavit of Lawrence Brunette

Exhibit F: Affidavit of Investigator David Troidl

Attachment 1: Diagram of 85 Randy Lane

Attachment 2: Selected crime scene photos from VSP casebook, See Subpart (n) to Attachment 1 to Exhibit A, Affidavit of Deputy Chief Jannine Wright.

Attachment 3: Photographs of 85 Randy Lane

Exhibit G: Affidavit of Kenneth Wallentine

Exhibit H: Affidavit of Chief Michael Schirling

Exhibit I: Affidavit of Vermont State Police Detective Sgt. Jeremy Hill

Exhibit J: Affidavit of Mary Little

Exhibit K: Affidavit of Detective Sergeant Jeremy Hill

Burlington, Vermont

June 8, 2015

DOWNS RACHLIN MARTIN PLLC

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